1		THE HONORABLE JOHN C. COUGHENOUR	
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7 8	IN THE UNITED STATE DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE		
9	BERNARD WAITHAKA, et al.,	Consolidated Action	
10	Plaintiffs,	Case No. 2:19-cv-01320-JCC	
11	V.	STIPULATION AND [PROPOSED] ORDER	
12	,	RE: EXTENSION OF TIME FOR MOTION FOR CLASS CERTIFICATION AND	
13	AMAZON.COM INC. and AMAZON LOGISTICS, INC.,	MOTION TO COMPEL ARBITRATION	
14	Defendant(s).	NOTE ON MOTION CALENDAR: July 3, 2024	
15	Defendant(s).	July 3, 2024	
16			
17	Plaintiff Bernard Waithaka ("Plaintiff") and Defendants Amazon.com, Inc. and Amazon		
18	Logistics, Inc. ("Defendants"), by and throu	gh their undersigned counsel of record, hereby	
19	stipulate and request that the Court extend Plaintiff's time to submit a Motion for Class		
20	Certification and Defendants' time to submit a Motion to Compel Arbitration from July 5, 2024 to		
21	August 2, 2024. We also ask that the court extend the deadline for Opposition briefs from August		
22	5, 2024 to September 3, 2024 and the deadline for reply briefs from August 20, 2024 to September		
23	18, 2024. Motions are to be noted for this date.	(Original deadlines set in ECF No. 166).	
24	///		
25	///		
26			
	STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR MOTION FOR CLASS CERTIFICATION AND MOTION TO COMPEL ARBITRATION – PAGE 1	MORGAN, LEWIS & BOCKIUS LLP ATTORNEYS AT LAW 1301 SECOND AVENUE, SUITE 3000 SEATTLE, WASHINGTON 98101 TEL +1.206.274.6400 FAX +1.206.274.6401	

Case No. 2:19-cv-01320-JCC

Stipulated by and between the parties through their counsel of record: 1 2 DATED: July 3, 2024. 3 FRANK FREED SUBIT & THOMAS MORGAN, LEWIS & BOCKIUS LLP 4 5 By: s/ Andrew DeCarlow By: s/Michael C. Subit Andrew DeCarlow, WSBA No. 54471 Michael C. Subit, WSBA No. 29189 6 1301 Second Avenue, Suite 3000 705 Second Avenue, Suite 1200 Seattle, WA 98101 Seattle, Washington 98104-1729 7 Telephone: (206) 274-6400 Telephone: (206) 682-6711 Fax: (206) 274-6401 8 Fax: (206) 682-0401 Email: andrew.decarlow@morganlewis.com Email: msubit@frankfreed.com 9 Richard G. Rosenblatt (*Pro Hac Vice*) James P. Walsh (*Pro Hac Vice*) Shannon Liss-Riordan (*Pro Hac Vice*) 10 MORGAN, LEWIS & BOCKIUS LLP Harold L. Lichten (Pro Hac Vice) 502 Carnegie Center Jeremy Abay (*Pro Hac Vice Forthcoming*) 11 Princeton, NJ 08540-6241 LICHTEN & LISS-RIORDAN, P.C. Telephone: (609) 919-6600 12 729 Boylston Street, Suite 2000 Fax: (609) 919-6701 Email: richard.rosenblatt@morganlewis.com Boston, MA 02116 13 james.walsh@morganlewis.com Telephone: (617) 994-5800 Fax: (617) 994-5801 14 Michael E. Kenneally (*Pro Hac Vice*) Email: sliss@llrlaw.com MORGAN, LEWIS & BOCKIUS LLP Email: hlichten@llrlaw.com 15 1111 Pennsylvania Avenue, N.W. Email: jabay@llrlaw.com Washington, DC 20004-2541 16 Telephone: (202) 739-3000 Fax: (202) 739-3001 Attorneys for Plaintiff Waithaka 17 Email: michael.kenneally@morganlewis.com 18 John S. Battenfeld (Pro Hac Vice) Max C. Fischer (*Pro Hac Vice*) 19 Brian D. Fahy (Pro Hac Vice) 300 S. Grand Ave., Suite 2200 20 Los Angeles, CA 90071 Telephone: (213) 612-2500 21 Email: ibattenfeld@morganlewis.com max.fischer@morganlewis.com 22 brian.fahy@morganlewis.com 23 Attorneys for Defendants Amazon.com, Inc. and 24 Amazon Logistics, Inc. 25 26

STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR MOTION FOR CLASS CERTIFICATION AND MOTION TO COMPEL ARBITRATION – PAGE 2
Case No. 2:19-cv-01320-JCC

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1	OR	<u>DER</u>
2	IT IS SO ORDERED.	
3 4	DATED: July 5, 2024.	
5		
6		John C Cogher a
7	110	N. JOHN C. COUGHENOUR
8		ITED STATES DISTRICT COURT JUDGE
9	Presented by:	
11	FRANK FREED SUBIT & THOMAS LLP	MORGAN, LEWIS & BOCKIUS LLP
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25 26		John S. Battenfeld ( <i>Pro Hac Vice</i> ) Max C. Fischer ( <i>Pro Hac Vice</i> ) Brian D. Fahy ( <i>Pro Hac Vice</i> )
	STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR MOTION FOR CLASS CERTIFICATION AND MOTION TO COMPEL ARBITRATION – PAGE 3 Case No. 2:19-cv-01320-JCC	MORGAN, LEWIS & BOCKIUS LLP ATTORNEYS AT LAW 1301 SECOND AVENUE, SUITE 3000 SEATTLE, WASHINGTON 98101 TEL +1.206.274.6400 FAX +1.206.274.6401

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5	Attorneys for Defendants Amazon.com, Inc. and Amazon Logistics, Inc.
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STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR MOTION FOR CLASS CERTIFICATION AND MOTION TO COMPEL ARBITRATION – PAGE 4 Case No. 2:19-cv-01320-JCC MORGAN, LEWIS & BOCKIUS LLP

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